

US DC - BALTIMORE
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

HARRISON JAMES MILLER,

Defendant.

CRIMINAL NO. BAH-23-0397

(Sexual Exploitation of a Child,
18 U.S.C. § 2251(a); Possession of Child
Pornography, 18 U.S.C. § 2252A(a)(5)(B);
Commission of a Felony Crime Involving a
Minor by a Registered Sex Offender, 18
U.S.C. § 2260A; Failure to Register as a Sex
Offender, 18 U.S.C. § 2250; Forfeiture, 18
U.S.C. § 2253)

INDICTMENT

COUNTS ONE THROUGH SIX
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland charges that:

General Allegations

1. Defendant **HARRISON JAMES MILLER** ("MILLER") was born in 1992, and resided in Hagerstown, Maryland.
2. Minor Victim 1 was born in 2018 and was approximately four years old at the time of the offenses against him.
3. Minor Victim 2 was born in 2018 and was approximately five years old at the time of the offenses against her.

The Charges

4. On or about the dates listed below, each instance being a separate count, in the District of Maryland, the defendant,

HARRISON JAMES MILLER,

did knowingly attempted to and did employ, use, persuade, induce, entice, and coerce the prepubescent minor victims listed below to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depiction of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, as follows:

Count	Date	Details
1	November 23, 2022	An image file, titled “d254c487fce8afe6,” depicting Minor Victim 1’s exposed genitals and anus.
2	November 28, 2022	Two image files, titled “47aa6e51d9c1474e” and “064c1978f05fa838,” depicting Minor Victim 1’s exposed genitals and anus.
3	February 13, 2023	An image file, titled “a439547776c0fd87,” depicting Minor Victim 1’s exposed genitals
4	February 14, 2023	Four image files depicting Minor Victim 2’s exposed genitals, two of which depict an adult male placing his penis near Minor Victim 2’s genitals and buttocks, titled as follows: <ul style="list-style-type: none"> • 6881644535892750577.0; • 4511114362304103954.0; • 5722747636795560159.0; and • a14e089331b27898e23b8c07300f987eb7d615d9401c92eb75e627a690766112.0
5	February 19, 2023	Two image files, titled “7ef42fca906e711f” and “0ce3513e7403c1c6,” depicting Minor Victim 1’s exposed genitals and anus.
6	February 21, 2023	Two image files, titled “2e43e07cc5109749” and “9f709a8061605e5e,” depicting Minor Victim 1’s exposed genitals and anus.

U.S.C. §§ 2251(a)

COUNT SEVEN
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 16, 2023, in the District of Maryland, the defendant,

HARRISON JAMES MILLER,

knowingly possessed any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), which image had been shipped and transported using any means or facility of interstate and foreign commerce and in and effecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit: a cell phone, Samsung SM-J737P, IMEI 354255096116340, made in Vietnam, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256

COUNT EIGHT

(Commission of a Felony Crime Involving a Minor by a Registered Sex Offender)

The Grand Jury for the District of Maryland further charges that:

Between in or about November 2022 and in or about February 2023, in the District of Maryland, the defendant,

HARRISON JAMES MILLER,

committed the felony offenses involving a minor charged in Counts One through Six of this indictment at times the defendant **MILLER** was required to register as a sex offender under the laws of the State of Maryland.

18 U.S.C. § 2260A

COUNT NINE
(Failure to Register as a Sex Offender)

The Grand Jury for the District of Maryland further charges that:

On or about and between March 3, 2023, to March 15, 2023, in the District of Maryland,
the defendant,

HARRISON JAMES MILLER,

a person required to register under the Sex Offender Registration and Notification Act, traveled in interstate or foreign commerce and did knowingly fail to register and update a registration as required by the Sex Offender Registration and Notification Act.

18 U.S.C. § 2250

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's convictions on any of the offense charged in Counts One through Seven of this Indictment.

Sexual Exploitation of Children Forfeiture

2. Upon conviction of any of the offenses set forth in Counts One through Seven of this Indictment, the defendant,

HARRISON JAMES MILLER,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections, 2251, 2251A, 2252, or 2252A, 2252B, or 2260 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received, or possessed in violation of Title 18, United States Code, Chapter 110;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Property Subject to Forfeiture

3. The property to be forfeited includes, but is not limited to, the following items seized from the defendant's residence in Hagerstown, Maryland, on or about March 16, 2023:

a. Samsung cell phone, SM-J737P, IMEI 354255096116340.

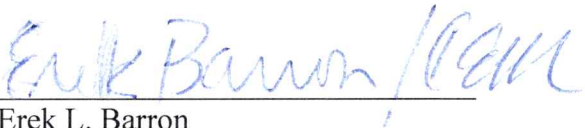
Substitute Assets

4. If any of the property described above, as a result of any act or omission of the defendant:

- b. cannot be located upon the exercise of due diligence;
- c. has been transferred or sold to, or deposited with, a third party;
- d. has been placed beyond the jurisdiction of the Court;
- e. has been substantially diminished in value; or
- f. has been commingled with other property that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)


Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

FOREPERSON

11/7/23

Date